

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>DORIS ANDREWS, as guardian of DAMASCO RODRIGUEZ, disabled,</b>	)	
<b>Plaintiff,</b>	)	<b>08 C 554</b>
	)	
<b>v.</b>	)	<b>Judge Guzman</b>
	)	
<b>CITY OF CHICAGO and Unknown Chicago Police Officers John Does One and Two,</b>	)	<b>Magistrate Judge Keys</b>
	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT CITY OF CHICAGO’S UNOPPOSED MOTION FOR AN EXTENSION  
OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

Defendant City of Chicago (the “City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Court grant it an extension of time of thirty (30) days, up to and including April 11, 2008, in which to answer or otherwise plead to plaintiff’s complaint. In support of this motion, the City states as follows:

1. On January 25, 2008, plaintiff filed a complaint against the City and two “unknown police officers” pursuant to 42 U.S.C. §1983 and Illinois law. Specifically, plaintiff alleges unlawful seizure, excessive force and failure to intervene claims against the individual defendants, and an indemnification claim against the City. The City was served on February 15, 2008. Accordingly, the City’s answer or other pleading was due on March 6, 2008.

2. Because the undersigned counsel for the City was only recently assigned to this case, additional time is needed to prepare the City’s answer or other pleading. The City therefore requests a thirty (30) day extension, up to and including April 11, 2008, by which time it should be able to investigate plaintiff’s allegations and gather and review any pertinent records.

3. This motion is the City’s first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

4. Plaintiff’s counsel does not oppose this motion.

WHEREFORE, the City respectfully requests that this Court grant it an additional thirty (30) days, up to and including April 11, 2008, in which to answer or otherwise plead to plaintiff's complaint.

Dated: March 12, 2008

Respectfully submitted,

MARA S. GEORGES  
Corporation Counsel for the City of Chicago

By: /s/ Marcela D. Sánchez  
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